

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Louis A. Santo Jr. aka Louis A. Santo	:	Chapter 13
Joy M. Santo	:	
Debtors	:	
	:	Case No. 1:22-bk-01912
U.S. Bank National Association as Trustee,	:	
Successor in interest to Bank of America,	:	
National Association as Trustee, successor	:	
by merger to LaSalle Bank National Association	:	
as Trustee for Morgan Stanley Mortgage	:	
Movant	:	
	:	Answer to
v.	:	Motion for Relief from Stay
	:	
Louis A. Santo Jr.	:	
Joy M. Santo	:	
Respondents	:	

RESPONDENT'S REPLY TO MOTION FOR
RELIEF FROM AUTOMATIC STAY OF SECURED CREDITOR

AND NOW, this 13th day of March, 2023, come the respondents, Louis A. Santo Jr. and Joy M. Santo, by and through counsel, the CGA Law Firm and Lawrence V. Young, Esquire, and does file the within response averring that:

1. Admitted.
2. Admitted.
3. Admitted.
4. The document speaks for itself.
5. Admitted.
6. Admitted. The Debtors have retained a realtor and has listed for sale for \$1,250,000.00 dollars.

7. Denied. The Debtors have no knowledge as to the amount needed to reinstate the loan, since they not received a mortgage statement since their Chapter 13 case was filed.
8. Denied. The movant is not entitled to relief from the automatic stay pursuant to 11 U.S.C. § 362(d).
9. Denied. The Debtors have no knowledge as to whether movant has incurred cost and fees.
10. The averments of Paragraph 19 constitute conclusions of law to which no response of pleading is required.

WHEREFORE, it is requested that the relief sought not be granted.

Respectfully submitted,
CGA Law Firm

/s/ Lawrence V. Young
Lawrence V. Young, Esquire
Sup. Ct. I.D. No. 21009
135 North George Street
York, PA 17401
(717) 848-4900
Counsel for the Debtor

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CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2023, service upon all interested parties indicated below was made by sending a true and correct copy of the Answer to Motion for Relief, by ECF and/or regular US Mail, postage prepaid, upon:

Jack N. Zaharopoulos, Esquire
Chapter 13 Trustee
ECF

Denise Carlon, Esquire
KML Law Group, P.C.
701 Market Street
Philadelphia, Pennsylvania 19106

/s/ Lawrence V. Young
Lawrence V. Young, Esquire